



February 16, 2012

Ms. Deborah Jordan
 Director, Air Division
 United States Environmental Protection Agency
 75 Hawthorne Street
 San Francisco, CA 94105

Dear Ms. Jordan:

This is to inform you that the District is formally proposing the Major Facility Review renewal permit for Lehigh Southwest Cement Company to EPA for its 45-day review period.

Application Number	Facility Number	Facility Name	Address, City	Type of Operation
17947	A0017	Lehigh Southwest Cement Co.	24001 Stevens Creek Blvd Cupertino, CA 95014	Cement Manufacturing

- ALAMEDA COUNTY**
 Tom Bates
 Scott Haggerty
 Jennifer Hosterman
 Nate Miley
 (Secretary)
- CONTRA COSTA COUNTY**
 John Gioia
 (Chairperson)
 David Hudson
 Mary Piepho
 Mark Ross
- MARIN COUNTY**
 Katie Rice
- NAPA COUNTY**
 Brad Wagenknecht
- SAN FRANCISCO COUNTY**
 John Avalos
 Edwin M. Lee
 Eric Mar
- SAN MATEO COUNTY**
 Carole Groom
 Carol Klatt
- SANTA CLARA COUNTY**
 Susan Garner
 Ash Kalra
 (Vice-Chair)
 Liz Kniss
 Ken Yeager
- SOLANO COUNTY**
 James Sperring
- SONOMA COUNTY**
 Susan Gorin
 Shirlee Zane

On August 12, 2009, the District published a notice inviting written public comment and conducted a public hearing in Cupertino on September 17, 2009, to solicit comments on the proposed Title V permit renewal for the Lehigh facility. The written public comment period ended on October 1, 2009.

On January 5, 2010, the District withdrew the proposed Title V permit renewal for the Lehigh facility because EPA was expected to adopt significantly more stringent emission standards for mercury and other toxic air contaminants from cement plants in amendments to 40 CFR 63, Subpart LLL, National Emission Standards for Hazardous Air Pollutants (NESHAP) from the Portland Cement Manufacturing Industry. The final EPA rule amendments were adopted and published on September 9, 2010. The District incorporated the following items into the Title V permit:

- Added new standards from the amended NESHAP rule
- Added a facility-wide permit Condition #24621 to include the Fugitive Dust Control Plan and source test requirement for small sources
- Added most recent applications for loss of exemption of portable IC engines, Mercury and Hydrochloric Acid reduction
- Addressed EPA's comments and updated the Compliance Assurance Monitoring (CAM) Analysis. CAM Condition #24781 was added to the Title V permit
- All second revisions are noted and explained in detail in the Statement of Basis for the proposed renewal Title V Permit

On January 21, 2011, the District published a second notice inviting written public comment on the proposed Title V permit renewal for the Lehigh facility and the public comment period ended on March 25, 2011. Since then, the followings items were added to the Title V Permit:

- Added "Coal & Coke" to S-171 and S-172 Kiln Fuel Mills on Table IIA-Permitted Sources
- Corrected the operating parameters for A-350, A-360 and A-370, Water Spray Systems to complete "surface wet" condition on Table IIB-Abatement Devices

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 EXECUTIVE OFFICER/APCO

- Added “7% O2” to the D/F limit since it was previously omitted on Table IV& Table VII-K for S-141 and S-142, Raw Mills
- Corrected Condition 13982, Part 4 from 24,000 tpy to 42,755 tpy for kiln dust throughput on Table IV & Table VII-MM for S-414 Kiln Dust Additive Bin per New Source Review Application 21217
- Clarified D/F monitoring & frequency using a temperature’s continuous parametric monitoring system (CPMS) instead of continuous emission monitoring system (CEMS) on Table IV & VII-N for the Cement Kiln
- Added “Application # 15572” to the NSR Permit Evaluation in Appendix C
- Addressed first and second public comments
- Added the most Updated Review of Compliance Record for Lehigh to the Statement of Basis

This Title V permit renewal includes the two Title V minor revisions for adding the Activated Carbon Injection System at the kiln and two synthetic gypsum feeders, which were issued on July 8, 2011 and January 9, 2012, respectively.

The District received 55 written comments and listened to 30 speakers during the first public notice and public hearing. EPA submitted 18 comments during the first public notice period. The District received 20 written comments from the public during the second public comment period. The District has reviewed and considered the comments it received during this process, and has provided responses as set forth herein. For each comment received, the District provides the rationale for either agreeing with the comment and modifying its proposal, or disagreeing and continuing with the proposal as originally published.

The initial Title V permit for this facility was issued on November 5, 2003. Details of the previous revisions can be found in Section X of the permit entitled “Revision History”. All proposed changes to the current permit are shown in strikeout/underline format for the first public notice and double strikeout/underline format for the second public notice. The BAAQMD compliance report was also updated by the Enforcement Division and was added to the statement of basis.

The proposed permit, statement of basis, fugitive dust control plan, operating & maintenance plan, EPA comments, and the District responses to EPA and public comments submitted during the first and second public comment periods can be viewed on the BAAQMD website at: <http://www.baaqmd.gov/Divisions/Engineering/Public-Notices-on-Permits.aspx>. If you have any questions regarding this project, please call Dennis T. Jang, Senior Air Quality Engineer, at (415) 749-4707.

Very truly yours,

Signed by Jeff McKay for Jack P. Broadbent
 Jack P. Broadbent
 Executive Officer/Air Pollution Control Officer

JPB:DTJ

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